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Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc., and Watch Tower Bible and Tract Society of Pennsylvania

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

ARIANE ROWLAND, and JAMIE
SCHULZE

Plaintiff,

VS.

WATCHTOWER BIBLE AND TRACT
SOCIETY OF NEW YORK, INC., and
WATCH TOWER BIBLE AND TRACT
SOCIETY OF PENNSYLVANIA,

Defendants.

[illegible]

Cause No. CV 20-59-BLG-SPW

STIPULATION REGARDING PLAINTIFFS' SECOND AMENDED COMPLAINT

Plaintiffs and Defendants, by and through their respective counsel, stipulate as follows:

1. Plaintiffs may file their proposed Second Amended Complaint (attached hereto as **Exhibit A**);
2. Plaintiffs Second Amended Complaint removes references to a non-party individual and changes no other allegations made in Plaintiffs' First Amended Complaint; and
3. Defendant Watchtower Bible and Tract Society of New York, Inc.'s Answer to Plaintiffs' First Amended Complaint (Doc. 17), and Defendant Watch Tower Bible and Tract Society of Pennsylvania's Motion to Dismiss and related briefing (Doc. 9, 10, 18) shall be deemed responsive and effective as to the allegations set forth in Plaintiffs' Second Amended Complaint and there is no need for Defendants to file an additional responsive pleading.

DATED this 14th day of October, 2021.

By: /s/ Ryan Shaffer
Ryan R. Shaffer
MEYER, SHAFFER & STEPANS PLLP

Attorneys for Plaintiff

By: /s/ Jon A. Wilson
Jon A. Wilson
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*Attorneys for Defendants
Watchtower Bible and Tract Society
of New York, Inc., and Watch Tower
Bible and Tract Society of
Pennsylvania*

CERTIFICATE OF SERVICE

Pursuant to Local Rule 1.4, this document has been served on all parties via electronic service through the Court's Case Management/Electronic Case Filing (CM/ECF) system.

/s/ Ryan Shaffer